



Air Pollution Control Board

Greg Cox	District 1
Dianne Jacob	District 2
Pam Slater-Price	District 3
Ron Roberts	District 4
Bill Horn	District 5

December 14, 2009

NOTICE OF WORKSHOP

FOR DISCUSSION OF IMPLEMENTATION OF THE NEW NATIONAL EMISSION STANDARDS FOR HAZARDOUS AIR POLLUTANTS FOR SUBPART HHHHHH – PAINT STRIPPING AND MISCELLANEOUS SURFACE COATING OPERATIONS AT AREA SOURCES

The San Diego County Air Pollution Control District (District) will hold a public workshop to discuss local implementation of new federal requirements pursuant to the Code of Federal Regulations, Title 40, Part 63, Subpart HHHHHH – National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources. Comments or questions may be submitted in writing before, or made at, the workshop which is scheduled as follows:

DATE: Wednesday, January 6, 2010
TIME: 9:00 a.m. to 11:00 a.m.
PLACE: Al Bahr Shrine
5440 Kearny Mesa Rd
San Diego, CA 92111-1303
(see map on pg. 5)

This federal regulation is designed to limit emissions of hazardous air pollutants (HAPs), specifically methylene chloride (MeCl) from paint strippers and compounds of chromium (both trivalent and hexavalent), lead, manganese, nickel or cadmium, collectively referred to as target HAP, from miscellaneous surface coating operations, or from motor vehicle or mobile equipment finishing or refinishing. Exposure to MeCl and target HAPs can cause cancer and other health problems. An area source of HAPs is any facility that emits less than 10 tons per year of any single HAP or less than 25 tons per year of total combined HAPs.

Coatings are considered to contain target HAPs if:

- The coating contains any individual target HAP that is an OSHA-defined carcinogen and the concentration exceeds 0.1 percent by mass; or
- The coating contains any individual target HAP that is not an OSHA-defined carcinogen and the concentration exceeds 1.0 percent by mass. To date, among the target HAP, only manganese is in this category.

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Subpart HHHHHH was promulgated by the Environmental Protection Agency (EPA) on January 9, 2008, and requires generally available control technology or management practices for each of the affected area source categories. Section 112 of the Federal Clean Air Act (CAA) required EPA to identify at least 30 HAPs whose emissions from area sources pose the greatest threat to public health in urban areas. Paint stripping, plastic and metal parts and products (surface coating), and auto body refinishing paint shops were listed under CAA Section 112 as area sources of HAPs.

The NESHAP applies to three types of operations located at an area source: paint stripping operations that use solvents containing MeCl; spray application of coatings to motor vehicles or mobile equipment; or spray application of coatings that contain target HAPs to plastic or metal parts and products, referred to in this notice as miscellaneous surface coating operations.

The NESHAP does **NOT** apply to surface coating operations performed for the following:

- On site at military installations.
- Military munitions or equipment exclusively used to transport military munitions.
- By individuals on their personal vehicles, property or possessions.
- Research and laboratory activities.
- Quality control activities.
- Activities that are covered under another area source NESHAP, e.g. Subpart XXXXXX.

This workshop notice summarizes the requirements for two of the three applicable source categories only: **paint stripping** and **miscellaneous surface coating operations**. The NESHAP requirements for facilities that use spray application equipment for coating of motor vehicles or mobile equipment for the purpose of finishing or refinishing has been addressed in a separate public workshop aimed specifically for that type of operation.

Specifically, the new NESHAP will require the following:

Existing sources: Existing sources are those that were in operation on or before September 17, 2007.

- Submit Initial Notification to the District, with a copy to EPA-Region IX, by January 11, 2010.
- Comply with the NESHAP requirements by January 10, 2011.
- Submit Notification of Compliance Status by March 11, 2011.
- If information previously provided has changed, submit annual Notification of Compliance Status report thereafter.

New or reconstructed sources: New or reconstructed sources are those that began initial operation after September 17, 2007.

- Submit Initial Notification to the District, with a copy to EPA-Region IX, within 180 days after start-up.
- Comply with the NESHAP requirements by initial startup.
- Submitting a separate Notice of Compliance Status is not required, provided that compliance is certified on the date of Initial Notification.
- If information previously provided has changed, submit annual Notification of Compliance Status report thereafter.

A copy of a sample Initial Notification that may be used by affected facilities will be provided at the workshop. This form may also be downloaded from the District's website as explained below.

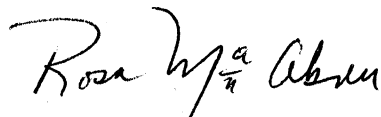
Operations that use MeCl in paint stripping operations shall implement the following management practices:

- Evaluate the need for paint stripping;
- Evaluate alternatives to MeCl;
- Reduce exposure of MeCl to the air;
- Optimize application conditions and reduce MeCl evaporation;
- Use proper storage and disposal of MeCl containing strippers;
- Maintain records on site of the following: any submitted notifications or reports; MeCl content information; annual usage of paint strippers containing MeCl; deviation and corrective action documentation;
- Facilities that conduct paint stripping operations that use more than one ton of MeCl per year must also develop and implement a written MeCl minimization plan that addresses the aforementioned requirements.

Miscellaneous surface coating operations that spray coatings containing the target HAP to plastic or metal parts shall implement the following:

- All painters are to be trained and certified, and receive refresher training every 5 years;
- Install filters on all spray booths/stations/enclosures with 98% capture efficiency;
- Spray booths/stations used to coat miscellaneous parts or products shall have a full roof, at least three walls or side curtains, and ventilated to draw air into booth;
- Spray-applied coatings shall be applied with HVLP spray gun, electrostatic application, airless spray gun, air-assisted spray gun, or equivalent;
- Spray gun cleaning shall be conducted within a container; and
- Maintain records on site of the following: any submitted notifications or reports; painter training certifications; spray booth filter efficiency; spray gun transfer efficiency; deviation and corrective action documentation.

The District requests that workshop participants bring their own copy of NESHAP Subpart HHHHHH, which may be downloaded from the District's website at <http://www.sdapcd.org/rules/wrkshps/wrkshed.html>, or you may call Janet McCue at (858) 586-2712. If you have any questions concerning District implementation or requirements of the new NESHAP, please contact Randy Consolacion at (858) 586-2752 or Natalie Yates at (858) 586-2756.

A handwritten signature in cursive script, reading "Rosa Maria S. Abreu". The signature is written in dark ink and is positioned above the printed name of the signatory.

ROSA MARIA S. ABREU, Assistant Director
Air Pollution Control District

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